

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Lockhart Chemical Company, f/k/a
Additives International,

Bankruptcy No. 22-22005
Chapter 7

Debtor.

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MOTION FOR *PRO HAC VICE* ADMISSION

1. This motion for admission *pro hac vice* is being filed by Keith D. Underkoffler (Applicant), Michigan Department of the Attorney General, Environment, Natural Resources, and Agriculture Division, P.O. Box 30755, Lansing, Michigan 48909, (517) 335-7664, underkofflerk@michigan.gov, Michigan State Bar ID P84854.
2. Applicant represents the Michigan Department of Environment, Great Lakes, and Energy (EGLE), 525 W. Allegan Street, Lansing, Michigan 48933.
3. Applicant is a member in good standing of the State Bar of Michigan, is not the subject of any pending disciplinary matters, is personally familiar with the Local Bankruptcy Rules of the United States Bankruptcy Court for the Western District of Pennsylvania and shall abide by those Local Bankruptcy Rules.
4. Pursuant to W.PA.LBR 9010-1(c)(2), local counsel is not necessary for an attorney “representing . . . any State (or agency thereof).” In accordance with this Local Rule, Applicant has filed the attached Certification of Government Attorney to satisfy the requirement to represent EGLE in this action.

5. Applicant has read and shall comply with Local Bankruptcy Rules 9010-1(b), 9010-1(c) and 9010-1(d).

6. To date, Applicant has never received Pro Hac Vice admission to this Court.

Respectfully submitted,

/s/ Keith D. Underkoffler

Megen E. Miller (P78901)

Keith D. Underkoffler (P84854)

Assistant Attorneys General

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Dated: October 27, 2022

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2022, I electronically filed the above document with the Clerk of the Court using the ECF system, which will send notifications of such filing to all of the parties of record.

Respectfully submitted,

/s/ Keith D. Underkoffler

Megen E. Miller (P78901)

Keith D. Underkoffler (P84854)

Assistant Attorneys General

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LF: Lockhart Chemical Co. (EGLE-RRD, MMD, WRD) BK/AG #2022-0357710-B/Pro Hac Vice Motion Underkoffler 2022-10-27